

REMARKS

Claims 1-24 are pending, with claims 1, 9, and 17 being independent. Claims 1, 5, 9, and 17 are amended. Applicant respectfully requests withdrawal of the outstanding rejections to the pending claims in view of the foregoing amendments and the following remarks.

35 USC §102 Rejections

Claims 1-24 stand rejected under 35 USC §102(b) as being anticipated by US patent serial number 6,021,443 ("Bracho"). Applicant respectfully traverses this rejection. Nevertheless, without conceding the propriety of the rejection, and in the interest of expending allowance of the application, claims 1, 9, and 17 are amended herein as discussed during the interview. Accordingly, claims 1-24 are allowable over Bracho for at least the reasons discussed during the interview.

Independent claim 1 recites in part:

- receiving at least one network attachment point change event subscription, **network attachment point change events comprising an indication of a change in a network address of a device on a network**
- receiving at least one network attachment point change event publication
- for each network attachment point change event publication matching a network attachment point change event subscription, notifying the network attachment point change event subscriber of the matching published network attachment point change event.

The Office Action asserts on page 2, that "Bracho et al teach a method (see abstract; figures 1, 5, 10, and 12; and column 4 line 34 to column 5 line 62) comprising: receiving at least one event subscription ..., receiving at least one event publication ...; and for each event publication matching a event

subscription, notifying the event subscriber of the matching published event (figures 5, 10, and 12; column 10 lines 47-61; column 12 line 45 to column 13 line 44; and column 15, lines 1-42).” However, the Office Action concedes that the “events” disclosed in Bracho are not described as being “network attachment point change events” as recited in independent claim 1. According to the Office Action, however, “Event is well known and inherent in the art at the time the invention was made as a network attachment point change event (figure 10; and column 12 lines 45-55).” Applicant respectfully disagrees.

Nevertheless, without conceding the propriety of the rejection, claim 1 is amended as discussed during the interview to recite that “network attachment point change events compris[e] an indication of a change in a network address of a device on a network.” Bracho fails to disclose or suggest subscription to or publication of such network address change events. Rather, the events described in Bracho have nothing to do with network attachment point change events. For example, Bracho describes that:

Publishers and subscribers are connected to each other through a network. The network is a "store and forward" network whose routing is "content-based." The basic quanta of information is called an "event." Publishers publish events and subscribers subscribe to events that match criteria defined by the subscriber. (Bracho, Abstract.)

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The subscriber specified the content filter at the time it subscribed to the event type (see field 774 of FIG. 7). For example, a subscriber may have requested to receive only those **SalesEvents** having where the customer lives in Los Angeles. If the event has values in the range specified by the subscriber, then the event

is sent to the subscriber in step 1222 (either directly or by way of its hub, as described below). (Bracho, column 15, lines 6-13.)

During the interview, the Examiner tentatively agreed that the events disclosed in Bracho do not amount to “network attachment point change events comprising an indication of a change in a network address of a device on a network,” and that claim 1 as amended is patentable over Bracho.

For at least the foregoing reasons Bracho does not expressly or inherently disclose every element of claim 1. Thus, Bracho cannot anticipate claim 1.

Dependent claims 2-8 depend from independent 1 and are allowable by virtue of this dependency as well as for the additional features that each recites. For example, **dependent claim 5** recites:

a first network attachment point change event publication from a first network attachment point change event publisher; and
a second network attachment point change event publication from a second network attachment point change event publisher; and
matching the first network attachment point change event to each network attachment point change event subscription comprises:
determining that the network attachment point change event subscription was placed by the second network attachment point change event publisher; and
determining that the second network attachment point change event occurred within a time interval of the first network attachment point change event.

The Office Action asserts that the features of claim 5 are taught by figures 7-9 and 12, and column 14 line 21 to column 15 line 64 of Bracho. The noted portions of Bracho merely refer to a “time stamp” and a “time spent field” of the

envelope, but do not appear to disclose or suggest, among other things, “determining that the second network attachment point change event occurred within a time interval of the first network attachment point change event,” as presently recited in dependent claim 5. Thus, claim 5 is allowable for at least this additional reason.

Claims 9-24: The Office Action asserts that “claims 9-16 do not teach or define any new limitations above claims 1-8 and claims 17-24 are merely an apparatus for performing the method of operations defined in claims 1-8.” However, contrary to the Office’s assertion, claims 9-24 recited features that are not found in claims 1-8. For example, **Independent claim 9** recites, among other things, “sending a subscribe message to a virtual connectivity subscribe-notify service subscribing to at least one network attachment point change event published by a remote peer, the at least one network attachment point change event comprising a change in a network address of the remote peer.” None of the other claims recites this feature. As another example, **independent claim 17** recites, among other things, “a virtual connectivity subscribe-notify service match module configured to, at least, search a network attachment point change event subscription database for a network attachment point change event subscription that matches a first network attachment point change event, the first network attachment point change event comprising a change in a network address of a device on a network.” None of the other claims recites this feature.

Applicant submits, and the Examiner agreed during the interview, that independent claims 9 and 17 recite features not disclosed or suggested by Bracho. For example, Bracho fails to disclose or suggest “sending a subscribe message to a virtual connectivity subscribe-notify service subscribing to at least one network

attachment point change event published by a remote peer, the at least one network attachment point change event comprising a change in a network address of the remote peer,” as presently recited in independent claim 9. Bracho also fails to disclose or suggest “a virtual connectivity subscribe-notify service match module configured to, at least, search a network attachment point change event subscription database for a network attachment point change event subscription that matches a first network attachment point change event, the first network attachment point change event comprising a change in a network address of a device on a network,” as presently recited in independent claim 17.

Dependent claims 10-16 and 18-24 depend from one of independent claims 9 and 17, and are allowable by virtue of this dependency as well as for the additional features that each recites.

Conclusion

Pending claims 1-24 are in condition for allowance. Should any issue remain that prevents allowance of the application, **Applicant requests that the Examiner contact the undersigned to discuss the issue prior to issuing any subsequent Action.**

Respectfully Submitted,

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